

During the 1990s communications technologies advanced somewhat slowly for terrestrial broadcasters although rather chaotically and I would say to the detriment of the industry, from my viewpoint as a consumer.

Seemingly in much the same spirit of the 1950s, when FM radio was in a severe crisis for its apparent survival, this Commission sought to remedy the imbalances perceived by a public interested in digital technologies and the level of quality service it was believed they could provide. At that time it was well-known and established that there were not any feasible systems of DAB being offered to the general public that allowed usage comparable to standard radios at that time nor was the concept of portability and complete accessibility afforded by combinations of mobile devices and systems even a remote possibility then.

I recall writing a letter to one of your offices in the early 1980s when I was a big fan of AM stereo broadcasts that asked about the then-new Compact Disc in relation to placing such a system on an FM signal (I never considered digital AM as possible then and was pleased to hear AM in stereo as it was). As you stated in this docket, you wrote back to tell me that it couldn't be done at that time.

Today I am writing to testify that I don't believe combining IBOC and SDARS as a mandatory receiver configuration is wise nor is it beneficial. While IBOC as permitted by the FCC exists and is being broadcast in both AM and FM form, it has far more severe flaws than either format should be subject to versus even quadrature based AM stereo. Oddly enough during that same time period I had several conversations with a local station engineer who is still revered and well employed in the area who told me frankly that he believed ISB was the best way to proceed and I respect him greatly to date, in large part due to my belief that he knew far more than I could understand as a youngster and he is absolutely correct in retrospect about not only that but many other things he told me.

In that spirit I always seek out the opinions of the engineers and technical workers that have to use these technologies as well as the public that always gets the end product. My conclusions are that technically hybrid digital AM is not

desirable in the least, FM IBOC works to a degree but damages the analog signal in ways I can't begin

to fathom why they are acceptable, the range and durability of either aren't acceptable and the last criticism is that DAB would be much better in a band of its own except that SDARS has usurped that band for all intents and purposes.

I have yet to see an HD/IBOC tuner or receiver even though the technology has been on-air since testing in about 2002. I haven't

seen one, nobody in a store can point one out and as a vintage and antique audio fan I don't see the point in owning one vs. owning and

maintaining quality sets I can find and really enjoy. Radio itself can be badly served and reduced to a commodity--like margarine--but good reception and enjoyment of the signals is the most important factor of all regardless of transmission formats.

If I have to take a side I will go with SDARS as I believe there are better in-channel DAB systems for FM, although I haven't heard them either and rely on my knowledge and the opinions of engineers I know and trust as a highly and unusually savvy listener. I still do not see the need for mandatory reception for either system and point to the 25 year fiasco of what was a great idea even in the 1950s (AM stereo), nipped in the bud in its infancy when AM stereo then could've actually improved things with better engineering standards and awareness about AM, not the 50 years of gradual sunseting that

followed. May I remind the Commission that Dolby FM was banned for

less than the kinds of troubles we face now as radio listeners? At

this time, many automobile companies and car audio manufacturers voluntarily include SDARS in one of the now merged company formats and HD is still in diapers so to speak when you try to find a set but the difference is drastically clear.

People voluntarily buy a new receiver to get SDARS and pay for the service because it works well, sounds better even though the bitrate tends to get squished in favor of more signals and more companies were willing to build the sets. AM broadcasters were among the first to experience the current state of promotional nightmares HD radio has also. Lack of sets, interest but ultimate rejection for FM stereo, the fact that there must be about a billion sets hoarded in North America alone so why buy more and now satellite radio plus the very crucial factor that nearly anybody can own or use a computer and see and hear what they like and expect that to be provided).

Canada has a DAB band that stands alone and yet I hear it too is

languishing and worldwide I have heard that total conversions have had major problems. LW/MW/AM or what ever the case...9 and 10 kHz AM

channels above 200 meters isn't a very good idea for this and there are so many stations that "skip" makes it ridiculous. You won't make a gold watch a sundial so concentrate on chopping down the "tree" that casts a shadow on the sundial. Many people seem to favor opening channel 6 as a new radio band but that is for another comment entirely.

To close and summarize, HD/IBOC is still tentative, not very good, will not be improved apparently as iBiquity currently offers it and it hinders and improvements in US radio broadcasting in my opinion and by that statement I do not believe it has a future even if mandatory. It has more fatal flaws than quadrature stereo and in AM form especially is inadequate to accomplish its goals while adding a new and undesirable quality that makes the overcrowded band even less listenable. While the FCC has chosen to ignore these facts, God hasn't bothered to modify the universe to make it work and any system that doesn't care how the universe works is a moot choice to me.